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Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY -- NEWARK
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In re:

Chapter 13

Jeisson Zambrano,

Case No.25-14304-JKS

Debtor

Conf. Hearing Date: 7/10/25
Time: 8:30 a.m.

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**ATTORNEY'S RESPONSE TO SECURED CREDITOR'S [MORTGAGEE'S] OBJECTION
TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

I, Nicholas Fitzgerald, the above named debtor's counsel, hereby responds to the mortgagee's objection to the confirmation of the debtor's modified Chapter 13 plan as explained below.

We had believed that the debtor was not at all behind on his mortgage payments on the date we filed the debtor's Chapter 13 case.

The mortgagee claims that the debtor was \$4,757.59 in arrears on his mortgage on the date we filed his case.

The debtor has proposed to pay a 100% dividend to the unsecured creditors with the exception of money owed on a vehicle with the vehicle being surrendered in full satisfaction of the debt owed thereon.

The claims bar deadline is July 7, 2025.

As to the payment of \$4,757.59 through the debtor's payment plan, our intention is to adjust the numbers once the claims deadline passes.

We have no problem with the trustee paying the mortgagee \$4,757.59 in mortgage arrears through the plan and with the payment of this amount to be put into the confirmation order as a secured arrears debt.

Dated: June 6, 2025



Nicholas Fitzgerald
Debtor's Counsel

Exhibit -- Copy of Notice of Objection

Denise Carlon, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106
(215) 627-1322
Attorneys for NewRez LLC d/b/a Shellpoint Mortgage Servicing

IN THE MATTER OF:

Jeisson Zambrano

DEBTOR(S),

IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY

CHAPTER 13
CASE NO. 25-14304 JKS

NOTICE OF OBJECTION

I, the undersigned, Esquire For KML Law Group, P.C., attorney for Secured Creditor **NewRez LLC d/b/a Shellpoint Mortgage Servicing**, the holder of a Mortgage on the debtors' premises at **468 Colonial Terrace Hackensack, NJ 07601** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. On or before the Bar Date of July 7, 2025, Secured Creditor will file a secured proof of claim for an estimated pre-petition arrears in the amount of \$4,757.59.
2. Debtor's plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by at least \$4,757.59 and does not provide sufficient funding to pay said claim.
4. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/ Denise Carlon, Esquire

Denise Carlon, Esquire
Attorney for NewRez LLC d/b/a Shellpoint Mortgage
Servicing

Dated: June 4, 2025